

Mr. Branden Doster
Hazardous Waste Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Dear Mr. Doster:

The Superfund removal program of the Environmental Protection Agency (EPA) is contemplating a removal action at OU1 of the West Lake Landfill in Bridgeton, Missouri. To perform this action, EPA would need to comply, to the extent practicable, with all applicable or relevant and appropriate state requirements (ARARs). This letter formally requests that the State of Missouri identify any potential ARARs for the proposed removal action at the site.

The proposed action has not been finalized to date, but primarily involves fire prevention measures and contingency planning for emergencies that could arise in areas of OU1 that contain radiologically impacted material (RIM). The primary elements of work in the proposed removal action include the following:

- Site surveillance and staffing
- Fire prevention measures in OU1 (ie devegetation, application of cover materials etc)
- Development of contingency plans for surface fires and other emergencies in OU1

We request that an appropriate state official identify potential ARARs in the tables provided, or an equivalent-type format. To qualify as state ARARs, these requirements must be promulgated. A state requirement is promulgated if it is legally enforceable and of general applicability.

The tables are divided into three sections addressing the following categories: chemical-specific requirements, location-specific requirements and action-specific requirements. Chemical-specific requirements are health- or risk-based numeric values that establish the acceptable amount or concentration of a chemical that may be found in, or discharged to, the ambient environment. Location-specific requirements are restrictions placed on the concentration of hazardous substances or the conduct of activities solely because they occur in special locations. For example, a location-specific requirement demands that hazardous waste storage facilities, if located within 100-year flood plains, must be designed, constructed, operated and maintained in a manner which avoids washout. Action-specific requirements are technology- or activity-based requirements or limitations on actions taken with respect to hazardous waste.

Your timely response will ensure that state requirements will be considered during the removal action. All information concerning state ARARs must be received in writing within thirty days of receipt of this letter. The EPA will examine your responses to determine whether they are applicable, or relevant and appropriate to the Site and will attempt to comply with those ARARs to the extent practicable. It is important to clarify, however, that all potential state ARARs identified in the tables may not be met during the removal.

Feel free to contact Ms. Lynn Juett at 913-551-7883 if you have any questions.

Sincerely,

Jeff Field, Chief
Missouri Kansas Branch
Superfund Division

Enclosures

TABLE 1: CHEMICAL-SPECIFIC REQUIREMENTS

Chemical	Maximum Concentration Allowed	Medium	Reason Why Requirement is an ARAR	Regulatory Citation

TABLE 2: LOCATION-SPECIFIC REQUIREMENTS

Location Subject to Requirement	Requirement	Reason Why Requirement is an ARAR	Regulatory Citation

TABLE 3: ACTION-SPECIFIC REQUIREMENTS

Action Subject to Requirement	Requirement	Reason Why Requirement is an ARAR	Regulatory Citation